

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**STIPULATION BETWEEN AND AMONG THE RAYMOND
SACKLER FAMILY, THE MORTIMER SACKLER
FAMILY, THE STATES OF CONNECTICUT, OREGON
AND WASHINGTON, AND THE DISTRICT OF COLUMBIA**

This Stipulation (the “Stipulation”) is entered into as of August 12, 2021, by and among the Raymond Sackler family, the Mortimer Sackler family (collectively, the “Sackler Families”), the States of Connecticut, Oregon, and Washington, and the District of Columbia (together, the “Objecting States,” and collectively with the Sackler Families, the “Parties”).

WHEREAS, during the final pre-hearing conference on August 9, 2021, concerning the hearing on confirmation of the Debtors’ proposed plan of reorganization (the “Plan”), the Court encouraged the Parties to meet and confer concerning evidentiary objections at the hearing;

WHEREAS, following the final pre-hearing conference, the Parties met and conferred and, after doing so, agreed to the terms of this Stipulation;

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

WHEREAS, at the hearing on August 12, 2021, counsel for the Raymond Sackler family read the terms of this Stipulation into the record in open court, and the Court requested that the Stipulation be committed to writing and filed on the docket;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The Parties will not ask the Court to make a finding or conclusion at the confirmation hearing on the ultimate merits of any underlying opioid claim against the Debtors or the Sackler Families.
2. The Raymond Sackler family will not offer the Declaration of Gregory Joseph, or the hypothetical findings and conclusions attached thereto, into evidence.
3. The documents on the Raymond Sackler family's exhibit list (attached as **Exhibit A**), on the Mortimer Sackler family's exhibit list (attached as **Exhibit B**), and on the Objecting States' exhibit lists (attached as **Exhibit C**), will be admitted into evidence without objection and for any purpose.² For clarity, this means that the expert reports of William Hrycay and Matthew Cain will be admitted, subject to cross-examination of those witnesses.
4. The fact that a Party did not present evidence or take testimony, other than in accordance with this Stipulation, at the confirmation hearing concerning the merits of underlying opioid claims against the Debtors or the Sackler Families, or defenses thereto, shall not have any effect or bearing on any future litigation of the merits of such claims, including in litigation against a Shareholder Release Snapback Party (as defined in the Plan).

² There are no remaining objections to the documents on Exhibits A-C. Debtors have withdrawn their objections to exhibits proposed by the parties to this Stipulation. Other than Debtors' objections, the only objections to the documents on Exhibits A-C were Maryland's objections to the Expert Reports of Lawrence A. Hamermesh and related exhibits, which were overruled by the Court on the record on August 13, 2021. **[The foregoing is subject to the Court's remarks on the purpose for which exhibits are to be admitted, as set forth on the record of the hearing on August 18, 2021 RDD.]**

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SO ORDERED:

Dated: August 18, 2021

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THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE